

REMARKS

Claims 1-15 remain in the present application. Claims 1 and 12 were amended in this response. No new matter has been introduced as a result of the amendment. Support for the amendment may be found in FIG. 1 and the accompanying text. Favorable reconsideration is respectfully requested.

Claims 1-5, 7 and 9-14 were rejected under 35 U.S.C. §102(a) as being anticipated by *Bhatia et al.* (U.S. Patent No. 6,118,768). Claim 6 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Bhatia et al.* (U.S. Patent No. 6,118,768) in view of *Guerin et al.* (6,243,754). Claim 8 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Bhatia et al.* (U.S. Patent No. 6,118,768). For the following reasons, Applicants respectfully traverse the Examiner's rejection and respectfully request the withdrawal thereof.

Specifically, the cited art, alone or in combination does not teach or suggest "selecting any one of the conversion devices by said device, via a selection unit implemented in the router device, using information transferred by the device, wherein the information identifies the selected one of the conversion devices; and setting up a communications link to the select conversion device via the communications network" as recited in claim 1 and similarly recited in claim 12.

Regarding *Bhatia*, the reference teaches the steps of connecting a device (USER), from which the connection originates, to a local computer network (Ethernet) and connecting the local computer network via a router device (LAN Modem 300 w/ router 305) to a communications network (col. 10, lines 19-42). The present claims further recite connecting the communications network via a plurality of conversion devices to the IP-oriented network. In this regard, the Office Action relies on the disclosure in FIG. 2A, which teaches that the LAN modem assigns a private IP address to each workstation that connects to the LAN and translates the individual private IP address of each of the workstations to a single public address assigned, either statically or dynamically, to the LAN modem by an ISP, by accessing a source-based routing table and a host list which collectively associate the private source IP address of a particular workstation on the LAN and a network ID for the service provider to which that workstation is ultimately connected through the LAN modem (col. 5, lines 16-26; col. 11, lines 1-23). The LAN modem also translates source and destination port number fields to assure uniqueness of a set of

source/destination IP addresses, protocol ID and source/destination port numbers in packets that flow between unique client/server applications and which pass through the LAN modem so as to provide unambiguous routing in the LAN modem between all the workstations connected to the LAN modem and associated remote servers (col. 5, lines 26-35; col. 11, line 59 - col. 12, line 34).

Thus, the LAN modem of *Bhatia* automatically translates public IP addresses (from an ISP) to private IP addresses (in the LAN) through different existing ISP connections corresponding to the LAN (col. 5, line 61 - col. 6, line 8). The aforementioned disclosure in *Bhatia* merely describes a network addressing translation system to create the appearance within the network that the transmissions are occurring within the context of a single user (col. 5, lines 36-40).

In contrast, the present claims recite that any one of the conversion devices are selected by the user device, via a selection unit implemented in the router device, using information transferred by the device, wherein the information identifies the selected one of the conversion devices and sets up a communications link to the selected conversion device via the communications network. There is no provision in *Bhatia* that allows users to select a given ISP. As discussed above, the configuration in *Bhatia* is specifically designed to hide the actual ISP from the users via the translation system embodied in the LAN modem. ISP selection in *Bhatia* also does not occur based on information which is transmitted to the associated router device, wherein the information identifies the selected conversion device. Furthermore, since *Bhatia* must establish all public and private connections prior to translating (col. 11, line 59 - col. 12, line 34 - each user must establish a connection with their own ISP, prior to translation), and then automatically translates according to a stored translation table, *Bhatia* fails to teach the system setting up a communication link to a selected conversion device. Accordingly, Applicants respectfully submit the rejection is improper and should be withdrawn.

Moreover, claim 3 provides further distinction from *Bhatia* where a connection setup is initialized by a first application running on the device, where information originating from a second application running on any given device is transferred to the router device. These features are provided by devices being able to select a specific ISP, where a first application is executed on one device to establish a connection where a second application running on any of

the devices is transferred to the router device (see Office Action page 9, paragraph 28). In *Bhatia*, a separate B-channel is set up from the LAN modem that allows multiple users to access the Internet during the same time using different ISP's (col. 11, lines 43-53). The stored account/password data disclosed in col. 5, lines 40-46 and stored in the LAN modem cannot be considered an "application running on the device" by any reasonable interpretation. As such, Applicants submit the rejection is improper and should be withdrawn.

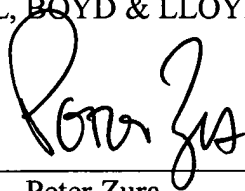
In light of the above, Applicants respectfully submit that independent claims 1 and 12 of the present application, as well as claims 2-11 and 13-15 which respectfully depend therefrom, are both novel and non-obvious over the art of record. Accordingly, Applicants respectfully request that a timely Notice of Allowance be issued in this case.

It is further noted that no fees are due with this response at this time. However, if any fees are due in connection with this application as a whole, the Examiner is authorized to deduct said fees from Deposit Account No.: 02-1818. If such a deduction is made, please indicate the attorney docket number (0112740-350) on the account statement.

Respectfully submitted,

BELL, BOYD & LLOYD LLC

BY



Peter Zura
Reg. No. 48,196
Customer No.: 29177
Phone: (312) 807-4208

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